

NORTHWEST INTERNET SERVICES

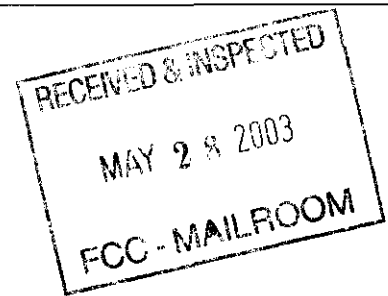
844 Wood Street ~ P.O. Box 186

Havelock, IA 50546

712-776-2612
1-800-249-5251

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nis@ncn.net
Fax: 712-776-4444



May 23, 2003

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, D.C. 20554

Re: Petition for Rulemaking Regarding Location and Monitoring
Service Rules - RM-10403

Dear Ms. Dortch:

Our company, Northwest Communications, provides wireless broadband service to rural communities in Iowa through use of unlicensed spectrum in the 902-928 MHz band. The Federal Communications Commission is currently considering a petition for rulemaking by Progeny LMS, LLC (RM-10403) to make certain rule changes that could artificially create "harmful interference" and hinder the use of unlicensed spectrum in this band. We are writing to express our serious concern that the changes proposed by Progeny will cause irreparable harm to rural consumers who rely on the spectrum for affordable broadband access, as well as compromise the investment made by Northwest Communications, in good-faith reliance on FCC Rules.

Northwest Communications is owned by Northwest Telephone Cooperative Association, a cooperative with a long history of providing quality telecommunications services to customers in rural areas in Iowa. Since 1995, our family of companies has provided high-quality Internet service to more than 60 communities. We have recently begun deploying a wireless broadband service using equipment manufactured by WaveRider Communications, Inc. This equipment uses unlicensed spectrum in the 902-928 MHz band. Currently, we provide this service to over 200 businesses and residential customers in five communities and, have educated and guided rural telecommunications providers in Missouri and Nebraska who also utilize this technology.

By using unlicensed spectrum, we have been able to provide broadband service to many rural consumers where other services, such as DSL or Cable Modems, are not available. In our initial deployment of wireless broadband service, we used equipment that operated on the 2.4 GHz band and required "line-of-sight" to deliver the services. Because the WaveRider product utilizes spectrum in the 900 MHz band, it has the capability of providing "non-line-of-sight" wireless links. As we have begun to install the 900 MHz in addition to the 2.4 GHz equipment, we have found that the "non-line-of-sight" technology is essential to successfully deploying wireless broadband in rural areas in the Midwest, which characteristically have significant tree

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coverage and variable terrain. In the communities where the 900 MHz equipment has been deployed, we have been able to reach more consumers and provide a higher quality service, which is evidenced by the fact that our customer base in these areas has tripled. Further deployment of 900 MHz equipment in rural communities is planned for the next two years and beyond.

This innovative wireless broadband service that is being provided to rural consumers is now being jeopardized by possible changes in FCC Rules. As demonstrated by WaveRider in its comments in this proceeding, granting Progeny's petition could eliminate unlicensed spectrum use in the 902-928 band without concomitant public interest advantages.¹ Accordingly, to ensure that rural consumers continue to receive quality wireless broadband services, we urge the FCC to reject Progeny's petition and maintain the status quo.

Sincerely,



Donald D. Miller, General Manager

cc: Richard Arsenault, Commercial Wireless Division, WTB

¹ See, Comments of WaveRider in RM-10403, filed May 14, 2002.